

APPENDIX E – FIRST PERMIT MODIFICATION

Statement of Basis

On August 1, 2006 Washington State Department of Transportation (WSDOT) submitted a request to modify the National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit No. WA-0039039 adding coverage for spot cleaning conducted through their regional road maintenance program.

Spot cleaning is a bridge maintenance activity where fracture critical points on a bridge are cleaned to prepare the bridge for inspection. The purpose of an inspection is to determine if a bridge is in need of painting or repair. The steps involved in spot cleaning are:

- Identify the fracture critical points that need to be cleaned
- Construct a containment system around the work area; plywood or other work platforms or drip tarps/#100 sieve filter fabric
- Remove dirt and debris using a combination of dry and wet methods such as hand scraping, flushing with water (high volume, low pressure system) or using a vacuum system

As a participant in the regional road maintenance program, WSDOT uses the *Regional Road Maintenance Endangered Species Act Program Guidelines* to select best management practices (BMPs) used during bridge maintenance activities. The guidelines provide a system on how to choose and combine different BMPs for different activities. Using this system provides WSDOT maintenance crews with the flexibility to choose BMPs best suited for the type of bridge structure scheduled for spot cleaning.

In considering the request to modify the existing permit, Department of Ecology reviewed the *Regional Road Maintenance Endangered Species Act Program Guidelines*. The BMPs listed in the *Guidelines* that are applicable to spot cleaning include:

- selection of a containment system,
- using a vacuum system,
- and selection of several BMPs to prevent sediment from being washed into a receiving waterbody from the adjacent shorelines.

These BMPs can be used with the dry and wet methods described in the steps for spot cleaning.

A comparison was made between the process for spot cleaning and BMPs, and the existing permit conditions for a full maintenance washing of a bridge structure and preparatory washing for painting. Spot cleaning is a reduced form of bridge maintenance washing with an associated discharge to receiving waters. The BMPs listed above for spot cleaning are already incorporated into the permit requirements. However, a full maintenance washing of a bridge structure does not utilize filter tarps or other types of containment as spot cleaning and in full maintenance, crews are required to clean the bridge using dry methods first. Providing coverage for this type of maintenance washing and allowing maintenance crews to choose different dry/wet methods that includes using a containment system, will still result in containment of dry debris, minimizing pollutant discharge to receiving waters. To ensure this outcome, permit conditions for this activity will require WSDOT to do the following:

- Apply the same timing restrictions in the permit as for a full maintenance wash
- Require spot cleaning be conducted when there is flowing water in the water channel

- Require collection, containment, and disposal of dry debris at an upland location.
- Inform Ecology of any updates to the *Regional Road Maintenance Endangered Species Act Program Guidelines*

The permit requires the effluent from the full maintenance washing to be characterized. In order to apply this data to the effluent from spot cleaning activities, WSDOT is required to collect data on the volumes of water being used.